

DEC 04 2024

BY MAIL

UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF MISSOURI
St. Louis DIVISION

NICHOLAS SCOTT WERLING
p/k/a LIL SIPPY

Complaint for a Civil Case

(Write the full name of each plaintiff
who is filing this complaint. If the
names of all the plaintiffs cannot fit in
the space above, please write "see
attached" in the space and attach an
additional page with the full list of
names.)

Case No.
(to be assigned by Clerk of
District Court)

Plaintiff requests trial by jury:

☒ Yes ☐ No

v.

GRIFFIN MENNE a/k/a Clark,
a/k/a Clark & Associates,
a/k/a @clarkywarky69 (on
YouTube), a/k/a **Better_Word_4378**

(Write the full name of each defendant.
The caption must include the names of
all of the parties. Fed. R. Civ. P. 10(a).
Merely listing one party and writing "et
al." is insufficient. Attach additional
sheets if necessary.) **on Reddit**

CIVIL COMPLAINT

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date, the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed without prepaying fees or costs.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Nicholas Werling
Street Address	P.O. Box 803
City and County	Sun Prairie and Dane
State and Zip Code	Wisconsin and 53590-0803
Telephone Number	(414) 286-9611
E-mail Address	gothshooter_trenchcoat@protonmail.ch

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	Griffin Menne
Job or Title	Unknown
Street Address	668 Bent Brook Court
City and County	Kirkwood and St. Louis
State and Zip Code	Missouri and 63122-2111
Telephone Number	(314) 780-0613
E-mail Address	UNKNOWN

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant. If you are suing for violation of your civil rights, you must state whether you are suing each defendant in an official capacity, individual capacity, or both.)

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only three types of cases can be heard in federal court. Provide the information for this case. *(Include all information that applies to your case)*

A. Federal question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

N/A

B. Suit against the Federal Government, a federal official, or federal agency

List the federal officials or federal agencies involved, if any.

N/A

C. Diversity of Citizenship

These are cases in which a citizen of one State sues a citizen of another State or nation, and the amount at stake is more than \$75,000. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

1. The Plaintiff(s)

The plaintiff, (name) Nicholas Werling, is a citizen of the
State of (name) Wisconsin.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)

If the defendant is an individual

The defendant, (name) Griffin Menne, is a citizen
of the State of (name) Missouri Or is a citizen
of (foreign nation) N/A.

If the defendant is a corporation

The defendant, (name) N/A,
is incorporated under the laws of the State of (name)
N/A, and has its principal place of
business in the State of (name) N/A Or
is incorporated under the laws of the State of (foreign nation)
N/A, and has its principal place
of business in (name) N/A.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy----the amount the plaintiff(s) claims the defendant(s) owes or the amount at stake----is more than \$75,000, not counting interest and costs of court, because *(explain)*:

Defendant Menne defamed Plaintiff online and Plaintiff seeks \$1,000,000.00 USD in damages.

III. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

Plaintiff Nicholas Werling is a resident of the state of Wisconsin. Defendant Menne is a resident of the state of Missouri. This court has jurisdiction pursuant to 28 U.S.C. § 1332. Plaintiff also goes by the name "Lil Sippy". Defendant also goes by the name "Clark". Defendant also uses the Reddit account u/Better_Word_4378 on Reddit to post and make comments. On November 14, 2024 at 9:48:10 CST Defendant replied to a comment on a Reddit post that he had made and said "Everyone begs for updates and Daniel content. It takes me no time at all out of my day to do so, better then that p3do sippy". P3do is a stylization of the word "pedo" which is short for the word "pedophile". The number 3 is often added instead of the letter "e" (and other various variations) because some users believe that certain controversial words can result in a user being shadowbanned or in other negative consequences for their account. "Sippy" is short for "Lil Sippy", a moniker for Plaintiff. Plaintiff is not a pedophile and never has been. Defendant made this comment solely for the purpose of defaming and libelling Plaintiff during an ongoing feud. Plaintiff sues for interstate defamation and libel.

The original comment can be viewed at:...

See Page 5A (attached)

IV. Relief

State briefly and precisely what damages or other relief you want from the Court. Do not make legal arguments.

\$1,000,000.00 USD in damages from Defendant Menne, a declaratory judgment declaring that Defendant Menne intentionally committed interstate defamation and interstate libel against Plaintiff Werling, and any other relief

PAGE 5A

The original comment can be viewed at:

<https://www.reddit.com/r/Daniellarson/comments/1grlo64/comment/lx7fvv0/>

and

https://www.reddit.com/r/Daniellarson/comments/1grlo64/november_12/

Archived versions of the comment (in case Defendant deletes the comment) can be viewed at:

<https://archive.is/gmNLq>

and

<https://archive.is/W9GGX>

A copy of the reddit webpage/thread has been attached to this complaint as well.

Do you claim the wrongs alleged in your complaint are continuing to occur now?

Yes ☒ No ☐

Do you claim actual damages for the acts alleged in your complaint?

Yes ☐ No ☒

Do you claim punitive monetary damages?

Yes ☒ No ☐

If you indicated that you claim actual damages or punitive monetary damages, state the amounts claimed and the reasons you claim you are entitled to recover these damages.

Plaintiff is entitled to \$1,000,000.00 in punitive damages from Defendant Menne because he intentionally committed interstate defamation and libel against Plaintiff and exhibited malicious intent, egregious intent, and highly...

See Page 6A, attached

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 28th day of November, 2024.

Signature of Plaintiff(s) 